

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1. STATE OF OKLAHOMA, ex rel.)
W.A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL OF)
THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the TRUSTEE FOR)
NATURAL RESOURCES FOR THE)
STATE OF OKLAHOMA,)

Plaintiff,)

v.)

Case No. 4:05-cv-00329-JOE-SAJ

1. TYSON FOODS, INC.,)
2. TYSON POULTRY, INC.,)
3. TYSON CHICKEN, INC.,)
4. COBB-VANTRESS, INC.,)
5. AVIAGEN, INC.,)
6. CAL-MAINE FOODS, INC.,)
7. CAL-MAINE FARMS, INC.,)
8. CARGILL, INC.,)
9. CARGILL TURKEY)
PRODUCTION, LLC,)
10. GEORGE'S, INC.,)
11. GEORGE'S FARMS, INC.,)
12. PETERSON FARMS, INC.,)
13. SIMMONS FOODS, INC., and)
14. WILLOW BROOK FOODS, INC.,)

Defendants.)

**MOTION BY THE STATE OF OKLAHOMA'S COUNSEL TO ADMIT
CO-COUNSEL *PRO HAC VICE***

COMES NOW Richard T. Garren, counsel of record for Plaintiff, The State of Oklahoma, and pursuant to LCvR 83.3(J) hereby moves for the admission *pro hac vice* of South Carolina attorney Elizabeth C. Ward, who will serve as co-counsel for the aforementioned Plaintiff if so admitted.

If this motion is granted by the Court, the undersigned Richard T. Garren and his law firm will continue to serve as counsel for the aforementioned Plaintiff in the instant action.

Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court. In support of this motion, a Request for Admission *Pro Hac Vice* has been attached and marked as Exhibit "A."

The granting of this motion and admission of Elizabeth C. Ward to serve as co-counsel for the aforementioned Plaintiff will cause no delay in this action and will not cause any opposing party to suffer prejudice or hardship. Movant believes that Elizabeth C. Ward is eligible for admission to the Bar of this Court, and Movant respectfully requests that the Court exercise its discretion to admit Elizabeth C. Ward *pro hac vice*.

A proposed order accompanies this motion.

Respectfully submitted,

RIGGS, ABNEY, NEAL, TURPEN,
ORBISON & LEWIS

By: 

Richard T. Garren, OBA #3253
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Tulsa, Oklahoma 74119-1010
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918/583-1549 - fax
Attorneys for Plaintiff
The State of Oklahoma

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the above and foregoing pleading was mailed this 30 day of June, 2005, to:

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/s/ Richard T. Garren

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Defendants.)

APPLICATION FOR ADMISSION OF ATTORNEY PRO HAC VICE

I, Elizabeth C. Ward, request admission *Pro Hac Vice* for the purpose of representing the Plaintiff, The State of Oklahoma, in this action. In support of this application, I represent that the following is true and correct:

1. My name is Elizabeth C. Ward.

EXHIBIT "A"

2. I am an attorney in the law firm of Motley Rice LLC. My business address, telephone number and fax number are as follows:

Motley Rice LLC
28 Bridgeside Boulevard
Mt. Pleasant, South Carolina 29465
(843) 216-9280 - Voice
(843) 216-9440 – Facsimile
lward@motleyrice.com

3. I was admitted to the South Carolina State Bar in 2000 and to the North Carolina State Bar in 1999. I am licensed and in good standing in each jurisdiction. My South Carolina State Bar Number is 16897. My North Carolina State Bar Number is 26617.

4. I am admitted to practice law and am in good standing in the United States District Court for the District of South Carolina, the United States District Court for the Eastern District of North Carolina, the United States District Court for the Middle District of North Carolina, and in the United States District Court for the Western District of North Carolina. A copy of a Certificate of Good Standing from the United States District Court for the District of South Carolina is attached hereto.

5. I have never been denied admission, disbarred, suspended for practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee, or administrative body. No proceedings which could lead to any such disciplinary action have ever been instituted against me in any such bodies.

6. I am familiar with the rules of evidence and the local rules of this Court.

7. I have associated with the Oklahoma law firm of Riggs, Abney, Neal, Turpen,

Orbison & Lewis, 502 West 6th Street, Tulsa, OK 74119, for the purpose of this litigation.

DATED this 23rd day of June, 2005.

Elizabeth C. Ward

Elizabeth C. Ward
South Carolina Bar No. 16897
SC Fed. ID No. 8043
Motley Rice LLC
28 Bridgeside Boulevard
Mt. Pleasant, SC 29465
(843) 216-9280 - Voice
(843) 216-9440 - Facsimile
lward@motleyrice.com

AO 136
(Rev. 6/82)

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA
DISTRICT OF SOUTH CAROLINA

I, Larry W. Propes, Clerk of the United States District Court, District of
South Carolina,

DO HEREBY CERTIFY That **Elizabeth C. Ward**, ID# 8043, was duly
admitted to practice in said Court on October 10, 2002, and is in good standing as
a member of the bar of said Court.

Dated at Charleston, South Carolina
on June 14, 2005.

Larry W. Propes, Clerk

By Lisa Richberg,
Deputy Clerk